

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION

UNITED STATES OF AMERICA,  
Plaintiff,

v.

2.749 ACRES OF LAND, MORE OR LESS,  
SITUATED IN HIDALGO COUNTY,  
STATE OF TEXAS; AND HELEN  
CATHERINE HARDWICKE ET AL.,  
Defendants.

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CASE NO. 7:20-CV.-00021

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**DEFENDANT NEUHAUS & SONS, LLC'S ORIGINAL ANSWER  
TO PLAINTIFF'S COMPLAINT IN CONDEMNATION**

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TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, NEUHAUS & SONS, LLC, (hereinafter referred to as "Neuhaus"), Defendant in the above-styled and numbered cause, and respectfully submits its Original Answer to Plaintiff's Complaint in Condemnation and in support thereof, would respectfully show the Court as follows:

**ADMISSIONS & DENIALS**

1. Defendant lacks sufficient knowledge or information to form a belief about the truth of paragraph 1.

2. Defendant admits the allegations in paragraph 2.

3. Defendant admits the allegations in paragraph 3.

4. Defendant admits the allegations in paragraph 4.

5. Defendant does not have sufficient information to admit or deny paragraph 5.

6. Defendant does not have sufficient information to admit or deny paragraph 6.

7. Defendant denies that the amount of compensation is sufficient as asserted in paragraph 7.

8. Defendant is without sufficient information to admit or deny paragraph 8, and Defendant has no knowledge as to whether it owns the tract referenced in paragraph 5.

9. Defendant is without sufficient information to admit or deny paragraph 9.

10. Defendant denies that Plaintiff is entitled to the relief sought against this Defendant in its Prayer.

#### **PRAYER**

11. For these reasons, Defendant asks the Court to enter judgment that Plaintiff take nothing against this Defendant and that the Court adjudicate the owner or owners of the tract being taken and that the Court determine the just compensation for taking the tract.

Respectfully submitted,

JONES, GALLIGAN, KEY & LOZANO, L.L.P.

By: 

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*Attorney in Charge for Defendant,  
Neuhaus & Sons, LLC*

CERTIFICATE OF SERVICE

I certify that on February 18, 2019, a copy of the foregoing was electronically filed using the CM/ECF system, which will automatically serve a Notice of Filing on the following attorneys:

Hilda M. Garcia Concepcion  
Assistant United States Attorney  
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LANCE A. KIRBY